STATE OF CALIFORNIA CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. CI-8676 FOR BRENNTAG WEST, INC. (SOCO-LYNCH FACILITY)

ENROLLMENT UNDER REGIONAL BOARD ORDER NO. R4-2002-0030 (Series No. 041) FILE NO. 03-174

REPORTING REQUIREMENTS

I.

A. Brenntag West, Inc. (hereinafter Discharger) shall implement this monitoring program on the effective date of this enrollment (December 16, 2003) under Regional Board Order No. R4-2002-0030. The first monitoring report under this Program is due by January 15, 2004.

Monitoring reports shall be received by the dates in the following schedule:

Reporting Period	Report Due
January – March	April 15
April – June	July 15
July - September	October 15
October – December	January 15

- B. If there is no discharge or injection during any reporting period, the report shall so state. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.
- C. By March 1 of each year, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall discuss the compliance record and the corrective actions taken or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements.
- D. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with waste discharge requirements. This section shall be located at the front of the report and shall clearly list all non-compliance with discharge requirements, as well as all excursions of effluent limitations.
- E. The Discharger shall comply with requirements contained in Section G of Order No. R4-2002-0030 "Monitoring and Reporting Requirements" in addition to the aforementioned requirements.

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II. MOLASSES INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding injection activities:

- 1. Location Map showing the injection points for the molasses, and
- 2. Written summary defining:
 - Depth of injection points;
 - Quantity of molasses injected per injection point and per vertical spacing at each point; and
 - Total amount of molasses injected.

III. GROUNDWATER MONITORING PROGRAM

A groundwater-monitoring program shall be designed to detect and evaluate impacts associated with the molasses injection activities. The following shall constitute the monitoring program for Monitoring Well Nos. MW-5 (upgradient), MW-7 and MW-19 (downgradient), and MW-20 and 21 (source). These sampling stations shall not be changed and any proposed change of monitoring locations shall be identified and approved by the Regional Board Executive Officer (Executive Officer) prior to their use. The Discharger shall conduct baseline sampling prior to molasses injection and regular sampling with the required frequencies of the monitoring wells mentioned above for the following groundwater parameters:

CONSTITUENT	<u>UNITS</u> ¹	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
pH	pH units	grab	Weekly²/Monthly³/Quarterly⁴
Temperature	°F	grab	Weekly²/Monthly³/Quarterly⁴
Oxidation-reduction potential	milivolts	grab	Weekly ² /Monthly ³ /Quarterly ⁴
Specific conductivity	μmhos/cm	grab	Weekly ² /Monthly ³ /Quarterly ⁴
Ferrous iron	μg/L	grab	Weekly²/Monthly³/Quarterly⁴
Dissolved Oxygen	μg/L	grab	Weekly ² /Monthly ³ /Quarterly⁴

 $^{^{1}}$ mg/L: milligrams per liter; $\mu\text{g/L}$: micrograms per liter; $\mu\text{mhos/cm}$: microohms per centimeter;

[°]F: degree Fahrenheit

Weekly sampling events are required for the first month from the injection date. The constituents can be monitored using a field test instrument.

Monthly sampling events are required after the first month sampling events for a period of six months.
 Quarterly sampling events are required after the monthly sampling events have been completed.

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Acetone	μg/L	grab	Monthly³/Quarterly⁴
Tetrachloroethene (PCE)	µg/L	grab	Monthly³/Quarterly⁴
Trichloroethene (TCE)	µg/L	grab	Monthly³/Quarterly⁴
Cis-1,2-dichloroethene (Cis-1,2-DCE)	μg/L	grab	Monthly ³ /Quarterly ⁴
Trans-1,2-dichloroethene (Trans-1,2-DCE)	μg/L	grab	Monthly³/Quarterly⁴
1,1-dichloroethene (1,1-DCE)	µg/L	grab	Monthly³/Quarterly⁴
1,2-dichloroethane (1,2-DCA)	μg/L	grab	Monthly ³ /Quarterly ⁴
1,1,1-trichloroethane (1,1,1-TCA)	µg/L	grab	Monthly³/Quarterly⁴ ·
Carbon tetrachloride	μg/L	grab	Monthly³/Quarterly⁴
1,2,4-trimethylbenzene	μg/L	grab	Monthly ³ Quarterly ⁴
1,1,1,2-trichloroethane	μg/L	grab	Monthly ³ /Quarterly ⁴
Benzene	μg/L	grab	Monthly ³ /Quarterly ⁴
Ethylbenzene	μg/L	grab	Monthly ³ /Quarterly ⁴
Toluene	μg/L	grab	Monthly ³ /Quarterly ⁴
Total xylene	μg/L	grab	Monthly ³ /Quarterly ⁴
Ethene	μg/L	grab	Monthly ³ /Quarterly ⁴
Methane	μg/L	grab	Monthly ³ /Quarterly ⁴
Dissolved Organic carbon	μg/L	grab	Monthly ³ /Quarterly ⁴
Sulfide	μg/l	grab	Monthly ³ /Quarterly ⁴
Total dissolved solids	mg/L	grab	Monthly ³ /Quarterly ⁴
Sulfate	mg/l	grab	Monthly ³ /Quarterly⁴
Chloride	mg/L	grab	Monthly ³ /Quarterly ⁴
Boron	mg/L	grab	Monthly ³ /Quarterly ⁴
Bromide	m/L	grab	Monthly³/Quarterly⁴
Nitrate	mg/L	grab	Monthly³/Quarterly⁴
Carbon dioxide	mg/L	grab	Monthly³/Quarterly⁴
Ferrous Iron	μg/L	grab	Monthly³/Quarterly⁴
Total iron	μg/L	grab	Monthly ³ /Quarterly ⁴

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1,4-Dioxane	µg/L	grab	Two-time ⁶
1,2,3-trichloropropane	μg/L	grab	Two-time ⁶
Priority pollutants ⁵	μg/L	grab	Two-time ⁶

A complete list of priority pollutants (Attachment A) is attached, but the Discharger is required to test only for volatile organic compounds (VOCs) on the priority pollutant list.

All groundwater monitoring reports must include, at minimum, the following:

- a. Well identification, date and time of sampling;
- b. Sampler identification, and laboratory identification;
- c. Quarterly observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.

IV. MONITORING FREQUENCIES

Specifications in this monitoring program are subject to periodic revisions. Monitoring requirements may be modified or revised by the Executive Officer based on review of monitoring data submitted pursuant to this Order. Monitoring frequencies may be adjusted to a less frequent basis or parameters and locations dropped by the Executive Officer if the Discharger makes a request and the request is backed by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each report shall contain the following completed declaration:

"I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

Executed on the	day of	at	
	_		(Signature
	-		(Title)"

The first sampling event is required within the first year from the effective day of this permit and the second is required one year after the date of first sampling event.

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All records and reports submitted in compliance with this Order are public documents and will be made available for inspection during business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region, upon request by interested parties. Only proprietary information, and only at the request of the Discharger, will be treated as confidential.

Ordered by:

Dennis A. Dickerson Executive Officer Date: December 16, 2003

ATTACHMENT A

PRIORITY POLLUTANTS

Metals

Antimony
Arsenic
Beryllium
Cadmium
Chromium
Copper
Lead
Mercury
Nickel
Selenium
Silver
Thallium
Zinc

Miscellaneous

Cyanide Asbestos (only if specifically required)

Pesticides & PCBs

Aldrin Chlordane Dieldrin 4,4'-DDT 4.4'-DDE 4.4'-DDD Alpha-endosulfan Beta-endosulfan Endosulfan sulfate Endrin Endrin aldehyde Heptachlor Heptachlor epoxide Alpha-BHC Beta-BHC Gamma-BHC Delta-BHC Toxaphene PCB 1016 PCB 1221 PCB 1232 PCB 1242

PCB 1248

PCB 1254 PCB 1260

Base/Neutral Extractibles

Acenaphthene Benzidine 1.2.4-trichlorobenzene Hexachlorobenzene Hexachloroethane Bis(2-chloroethyl) ether 2-chloronaphthalene 1.2-dichlorobenzene 1,3-dichlorobenzene 1,4-dichlorobenzene 3.3'-dichlorobenzidine 2.4-dinitrotoluene 2.6-dinitrotoluene 1,2-diphenylhydrazine Fluoranthene 4-chlorophenyl phenyl ether 4-bromophenyl phenyl ether Bis(2-chloroisopropyl) ether Bis(2-chloroethoxy) methane Hexachlorobutadiene Hexachlorocyclopentadiene Isophorone Naphthalene Nitrobenzene N-nitrosodimethylamine N-nitrosodi-n-propylamine N-nitrosodiphenylamine Bis (2-ethylhexyl) phthalate Butyl benzyl phthalate Di-n-butyl phthalate Di-n-octyl phthalate Diethyl phthalate Dimethyl phthalate Benzo(a) anthracene Benzo(a) pyrene Benzo(b) fluoranthene Benzo(k) fluoranthene Chrysene Acenaphthylene Anthracene 1,12-benzoperylene Fluorene Phenanthrene

1,2,5,6-dibenzanthracene

Indeno (1,2,3-cd) pyrene

Pyrene

TCDD

Acid Extractibles

2,4,6-trichlorophenol P-chloro-m-cresol 2-chlorophenol 2,4-dichlorophenol 2,4-dimethylphenol 2-nitrophenol 4-nitrophenol 2,4-dinitrophenol 4,6-dinitro-o-cresol Pentachlorophenol Phenol

Volatile Organics

Acrolein Acrylonitrile Benzene Carbon tetrachloride Chlorobenzene 1.2-dichloroethane 1.1.1-trichloroethane 1,1-dichloroethane 1,1,2-trichloroethane 1,1,2,2-tetrachloroethane Chloroethane Chloroform 1,1-dichloroethylene 1,2-trans-dichloroethylene 1.2-dichloropropane 1.3-dichloropropylene Ethylbenzene Methylene chloride Methyl chloride Methyl bromide Bromoform Dichlorobromomethane Chlorodibromomethane Tetrachloroethylene Toluene Trichloroethylene Vinyl chloride 2-chloroethyl vinyl ether **Xylene**